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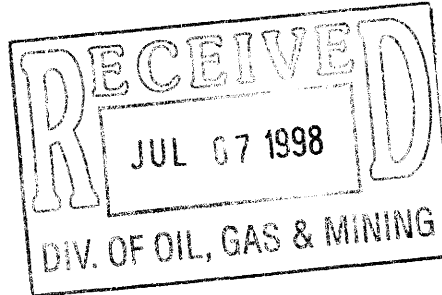
CO-OP MINING COMPANY

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Huntington, Utah 84528



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Coal Program
Utah Division of Oil, Gas & Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801



June 30, 1998

To Whom It May Concern,

Re: Response to Midterm Review, Bear Canyon Mine, ACT/015/025, Emery County, Utah

Enclosed is an amendment responding to the deficiencies outlined in the Midterm Review deficiency memo. The response has resulted in an increase in the estimated reclamation bond for the Bear Canyon Mine. Upon approval of the changes, Co-Op will increase the bond to the required amount.

If you have any questions, please call Charles Reynolds at (435) 687-2450.

Thank You,

Wendell Owen

Wendell Owen
Resident Agent

*Copy Response (6 pages)
= Letter
to Aaron*

CR
Enclosure(s)

APPLICATION FOR PERMIT PROCESSING

Permit Change <input checked="" type="checkbox"/>	New Permit <input type="checkbox"/>	Renewal <input type="checkbox"/>	Transfer <input type="checkbox"/>	Exploration <input type="checkbox"/>	Bond Release <input type="checkbox"/>	Permit Number: ACT/015/025
Title of Proposal: Midterm Review						Mine: BEAR CANYON MINE
						Permittee: CO-OP MINING COMPANY

Description, include reason for application and timing required to implement:

This submittal is made in response to the midterm review analysis per Division letter dated May 27, 1998.

Instructions: If you answer yes to any of the first 8 questions (gray), submit the application to the Salt Lake Office. Otherwise, you may submit it to your reclamation specialist.

<input type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? _____ acres <input type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	2. Is the application submitted as a result of a Division Order? DO # Letter dated May 27, 1998.
<input type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input type="checkbox"/> Yes	17. Does the application require or include construction, modification, or removal of surface facilities?
<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input type="checkbox"/> Yes	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input type="checkbox"/> Yes	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

☐ **Attach 7 complete copies of the application.**

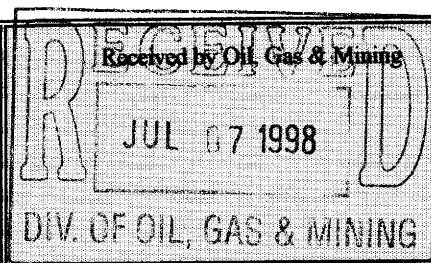
I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Wendell Owen Res agent 6/30/98
Signed - Name - Position - Date

Subscribed and sworn to before me this 30 day of June, 19 98

Notary Public

My Commission Expires: July 10, 2001
Attest: STATE OF Utah COUNTY OF San Juan



ASSIGNED TRACKING NUMBER

19102001

Application for Permit Processing

Detailed Schedule of Changes to the MRP

Title of Application:

Permit Number: ACT/015/025

Midterm Review

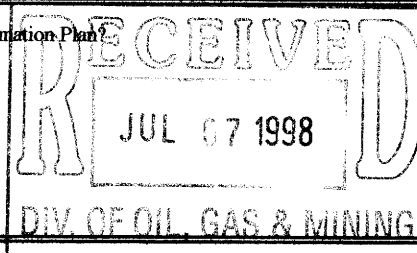
Mine: BEAR CANYON

Permittee: CO-OP MINING

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
	<input type="checkbox"/> REPLACE		pg. 2-3; Permit area acreage, statement added to Section 2.2.2.
	<input type="checkbox"/> REPLACE		Plate 2-4C; Surface Facilities identified and clarified
	<input type="checkbox"/> REPLACE		pp. 3-66, 3-67; Nielson Construction landfill identified as disposal site in Section 3.6.3.2.
	<input type="checkbox"/> REPLACE		pp. 3-83, 3-86 thru 3-111 (Section 3.6.8); Bond calculations revised, text repaginated
		<input type="checkbox"/> REMOVE	pg. 3-101A; Text repaginated
<input type="checkbox"/> ADD			pp. 3-112 thru 3-116; Text repaginated
	<input type="checkbox"/> REPLACE		pp. 3A-2, 3A-10; "Shop" label changed for clarity
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	

Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?



Co-Op Mining Company
ACT/015/025
Response to Midterm Review

Following is an item-by-item response addressing the technical deficiency memo received in relation to the Bear Canyon Mine midterm review.

Disposal of Building Debris

- The Permittee did not identify the landfills where the building debris and other noncoal waste will be disposed.

Pages 3-66 and 3-67 have been corrected to identify the Nielson Construction landfill, located adjacent to the Emery County landfill, which is permitted to receive mining noncoal waste. This is the landfill which currently takes Co-Op's noncoal waste which is generated on site.

- The Permittee did not include the dump fee in the reclamation cost estimate.

The dump fee which is currently charged by the Nielson Construction landfill has been included in the bond calculations on page 3-101.

- The permittee did not include the demolition cost for floors, footers, and foundations in the reclamation cost estimate.

These costs have been added to the reclamation cost estimate. See individual items below.

Sales-Receiving-Scale House Complex

- The Permittee did not give the Division detailed information on the demolition costs for the floor, foundation and footers at the sales-receiving-scale house complex.

The costs have been added. See page 3-87.

Shower House

- The Permittee did not give the Division detailed information on the demolition cost for the floor, foundation and footers.

The costs have been added. See page 3-88.

Shop

- The Permittee did not give the Division detailed information on the demolition cost for the floor, foundation and footers.

The costs have been added. See page 3-89.

- The Permittee did not identify the shop building on the surface facilities maps. The shop might be labeled the Bath House and Shop on Plate 2-4C. Referring to the building by different names in the MRP is confusing the permit reviewer.

Plate 2-4C has been corrected. Until 1995, the bath house was part of the shop building. In December, 1995, a fire destroyed the bathhouse portion, after which a new one was constructed (Plate 2-4B). Inadvertently, Plate 2-4C was not corrected in the previous bathhouse permit amendment.

Machine Shop

- The permittee did not give the Division detailed information on the demolition cost for the floor, foundation and footers.

The costs have been added. See page 3-90.

Coal Processing/Crusher Facility (Tipple)

- The permittee did not give the Division detailed information on the demolition cost for the floor, foundation and footers.

The costs have been added. See page 3-91.

Hiawatha Bin

- The Permittee did not identify the Hiawatha bin on the surface facilities maps.

This structure is identified as the Coal Storage Bin on Plate 2-4C and in Appendix 3-A. The identification in the bond calculations has been corrected.

- The Permittee did not identify how the steel would be disposed.

Page 3-87 states that M&P Enterprises in Huntington, Utah will pick up the scrap iron at no cost. An additional statement has been added to clarify the disposal of the steel.

Lump Coal Bin

- The Permittee did not identify how the steel would be disposed.

Page 3-87 has been revised to clarify the disposal of the steel.

Coal Recovery Bin Foundation

- The Permittee did not identify the coal recovery bin foundation on the surface facilities maps.

This structure has been identified on Plate 2-4C.

Slack Bin

- The Permittee did not identify the slack bin on the surface facilities maps, and did not identify how the steel would be disposed.

The slack bin structure was removed and reclaimed in 1996, and no longer exists. Reclamation costs have been removed from the bonding and information pertaining to this structure has been removed from the Surface Facilities section.

Lump Coal Storage Pad

- The Permittee did not identify the lump coal storage pad on the surface facilities maps.

The pad was identified as the "lump coal storage area". This designation has been changed on Plate 2-4C to make the plan clear and concise.

Equipment Wash Pad

- The Permittee did not identify the equipment wash pad on the surface facilities maps.

The identification has been changed on Plate 2-4C to make the plan clear and concise.

Fans

- The Permittee did not identify the fans on the surface facilities maps.

The fans are identified on Plate 2-4C (adjacent to the water tank, powder and cap magazines), on Plate 2-4E (Fan Housing), and on Plate 2-5 (Blind Canyon Fan).

- The Permittee did not identify how the steel would be disposed.

Page 3-87 states that M&P Enterprises in Huntington, Utah will pick up the scrap iron at no cost. An additional statement has been added to clarify the disposal of the steel.

Structures and Conveyors (Including Loadouts)

- The Permittee did not identify how the steel would be disposed.

Page 3-87 states that M&P Enterprises in Huntington, Utah will pick up the scrap iron at no cost. An additional statement has been added to clarify the disposal of the steel.

Building Enclosure for Tank Seam Belt Portal

- The Permittee did not identify how the steel would be disposed.

Page 3-87 states that M&P Enterprises in Huntington, Utah will pick up the scrap iron at no cost. An additional statement has been added to clarify the disposal of the steel.

- The Permittee said that the building was steel but used the Means costs for concrete building demolition. The Permittee must use the correct unit cost for building demolition.

Co-Op used the Means costs of \$0.16 per C.F. listed in 020-604-0500. This number is identified in Means as "Small bldgs, or single bldgs, no salvage included, steel", and does not refer to concrete building demolition.

Scalehouse Area Pavement

- The Permittee did not include the disposal cost for the asphalt in the reclamation cost estimate.

The disposal cost is found on page 3-97, but did not include dump fees. These costs have been relocated in the text and is now found following the costs of the Scalehouse building. Dump fees have been included.

Missing Structures

- The Permittee must include the demolition cost of all structures in the permit area. The structures not included in the reclamation cost estimate include but are not limited to: septic tanks, fuel lines, antifreeze tank, mobile loadout, watchman's trailer, coal spray tanks, and powder and cap magazines.

Reclamation costs have been added for septic tanks (3-100), fuel lines (3-97), mobile loadout watchman's trailer (3-100), and powder and cap magazines (3-101). The coal spray tanks and antifreeze tanks are included with the Fuel Storage tanks. The section heading has been clarified to indicate this inclusion.

Deficiencies Associated with Earthwork

Tank Seam Access Road and Portal Pad Area

- Include the cost for moving 8,050 cubic yards of material. On Page 3-101 of the MRP the Permittee states that 18,711 cubic yards of material must be moved. However, the Permittee included a cost estimate for moving 10,661 cubic yards of material.

The costs shown on page 3-101 are for **hauling** 10,661 cubic yards of material. The cost of moving material is shown on page 3-100 (First item listed in the Soil Placement table).

Coal Pad and Upper Storage Areas

- Include the cost of moving at least 19,453 cubic yards of material. On Page 3-101 of the MRP the Permittee gives the estimated cost of moving 4,120 cubic yards of material. However, on Table 3L-2 on Page 3L-5 show that the Permittee will cut 23,573 cubic yards. The Permittee must include the cost estimate for moving the additional 19,453 cubic yards of material.

Again, the costs on page 3-101 are for **hauling** 4,120 cubic yards of material. Page 3-100 (Soil Placement) provides the costs for moving material. The seventh item in the table (Coal Storage Pad) provides the costs for the 19,453 cubic yards of material.

- The Permittee must state where the material that will be used to fill the borehole will come from on Page 3-102 of the MRP.

Page 3-101A states that "10,560 cu yd will need to be hauled from the **Blind Canyon Seam portal**." During construction of the borehole, the material generated from the excavation were placed and stored inside the Blind Canyon Seam portal. This same material which was excavated will be used to backfill the borehole.

Permit Boundaries

- The Permittee must give a legal description of the permit area and state permitted acreage.

Section 2.2.2 (page 2-3) gives a legal description of the permit area. A statement has been added to make this clear and concise. The total number of acres within the permit area has been included in section 2.2.2.